

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

JERRY LAZA
Counter-PLAINTIFF,

CIVIL ACTION 6:17-CV-00533-RWS

V.

CITY OF PALESTINE, et al
Counter-DEFENDANTS.

PROBABLE LENGTH OF TRIAL

The Plaintiff estimate that the probable length of trial is **5 days**.

The Plaintiff respectfully request the following time allocations per side:

- **Voir Dire:** 1 day
- **Opening Statements:** 1 hr
- **Direct and Cross Examinations:** 3 days (excluding time for openings, closings, and voir dire)
- **Closing Arguments:** 1 hr

These estimates are submitted in good faith based on the current understanding of the issues and anticipated evidence.

HOWEVER, as previously stated, a continuance in this case is both necessary and warranted to protect Plaintiff Jerry Laza's right to a fair and just adjudication of his claims. Given the timing of the transition in counsel, the delay in obtaining the full case file, and the proximity of the current trial date, Plaintiff's newly retained counsel has not had a reasonable opportunity to meaningfully review the voluminous record, complete discovery, prepare pretrial filings, or

adequately prepare for trial. Denying this request would risk substantial prejudice to the Plaintiff, hinder the effective administration of justice, and compromise the integrity of the proceedings. Accordingly, Plaintiff respectfully urges the Court to grant the requested 120-day continuance and issue an Amended Docket Control Order to reflect the new schedule, thereby allowing sufficient time for thorough preparation and compliance with all procedural obligations.

Respectfully submitted,

Respectfully submitted by ***Mosser Law PLLC***

By: /s/ Jacob R. Barfield

Jacob R. Barfield

Texas Bar No. 24129303

James C Mosser

Texas Bar No. 00789784

Nicholas D. Mosser

Texas Bar No. 24075405

Email: courtdocuments@mosserlaw.com

8100 Dallas Parkway Suite 115A

Plano, TX 75024

Tel. (972) 733-3223

Lawyers For Plaintiff